

Table 1.

## .: ANNUAL RESPONDENT BURDEN &amp; COST OF MONITORING/RECORD KEEPING/REPORTING

Burden Item	Person- hours per occurrence	Occurrences per Respondents	Person- hours per respondent	Respondents	Total person- hours	Cost\$
	(A)	(B)	(C)=(AxB)	(D)	(E)=(CxD)	(H) <sup>a</sup>
1. Applications	N/A					
2. Surveys and Studies	N/A					
3. Reporting Requirements						
A. Read Instructions	N/A					
B. Required Activities						
- Submit Design Plan	N/A					
- Initial performance test report	N/A					
- Annual Compliance Report	2	1	2	173	346	19,538.62
- Quarterly surface methane monitoring <sup>b</sup>	14	4	56	173	9,688	547,081.36
- O&M of portable monitor <sup>c</sup>						
C. Create Information	See 3B					
D. Gather Existing Information	See 3E					
E. Write Report						
- Initial design capacity report	N/A					
- Annual report of NMOC flow rate (Tier 1 calculation)	N/A					
- Report of Tier 2 and 3 Sampling	N/A					
- Report of initial performance test	See 3B					
- Semi-annual compliance report	See 3B					
4. Recordkeeping Requirements						
A. Read Instructions	See 3A					
B. Plan Activities	N/A					
C. Implement Activities	N/A					
D. Develop Record System	N/A					
E. Time to Enter Information						
- Records of control system monitoring <sup>b</sup>	0.5	12	6	173	260	14,653.97
- Records of accumulated refuse	8	1	8	173	1,384	78,154.48
F. Time to train Personnel						
G. Time for Audits	N/A					
<b>Total BURDEN AND COST</b>					<b>11,678</b>	<b>659,428</b>

<sup>a</sup> It's estimated that 85% of the respondent burden hours is technical; 5% management; 10% clerical. The average cost is \$56.47. Costs are based on 1989 CAIR labor rates adjusted using the latest Employment Cost Index which yields the following March 1998 hourly rates: technical at \$57.12, management at \$85.81 and clerical at \$36.27.

<sup>b</sup> Monitoring hours include operating and maintenance time.

<sup>c</sup> Operating and maintenance costs for the year is estimated at \$1400/monitor.

Table 2. Annual Burden and Cost for the Federal Government

Activity	EPA hours per occurrence	Occurences per Respondent	Person-hours per Respondent	Respondents	Total person-hours	Cost \$ Yr
	(A)	(B)	(C) = (AxB)	(D)	(E) = (CxD)	(H) <sup>a</sup>
Review initial design capacity report	N/A					
Review report of initial performance test.	N/A					
Review Design Plan	N/A					
Observe initial performance tests	N/A					
Review annual NMOC emission rate report	2	1	2	173	346	12,874.66
Review Tier 2 Calculations	N/A					
Review Tier 3 Calculations	N/A					
Review annual compliance report	2	1	2	173	346	12,874.66
Travel expenses for tests attended	N/A					
					692	25,749.32

<sup>a</sup> It's estimated that 85% of the respondent burden hours is technical; 5% management; 10% clerical. Using The average cose is \$56.47. Costs are based on 1989 CAIR labor rates adjusted using the latest Employment Cost Index which yields the following March 1998 hourly rates: technical at \$38.30, management at \$51.62 and clerical at \$20.72